

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:22-cv-00422-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF REZA MIRZAIIE IN SUPPORT OF
PLAINTIFF HEADWATER RESEARCH LLC'S NOTICE OF SUPPLEMENTAL
FACTS REGARDING PLAINTIFF'S MOTION TO STRIKE PORTIONS OF THE
EXPERT OPINIONS OF DR. DAN SCHONFELD (DKT. 240)**

I, Reza Mirzaie, declare and state as follows:

1. I am a member of the State Bar of California and a partner at the firm of Russ August & Kabat, counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff's notice of supplemental facts regarding Headwater's motion to strike portions of the expert opinions of Dr. Dan Schonfeld (Dkt. 240). I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of excerpts from Samsung's Request for *Ex Parte* Reexamination of U.S. Patent No. 9,143,976, dated August 5, 2024 (highlighting added).

Executed on August 13, 2024 in Los Angeles, California.

/s/ Reza Mirzaie
Reza Mirzaie